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REDACTED - FOR PUBLIC INSPECTION

November 30, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Applications of GCI Communication Corp., ACS Wireless License Sub, Inc.,

ACS of Anchorage License Sub, Inc., and Unicom, Inc. for Consent to the

Assignment of Licenses to Alaska Wireless Network, LLC

WT Docket No. 12-187

Dear Ms. Dortch:

ACS Wireless License Sub, Inc. and ACS of Anchorage License Sub, Inc. (collectively "ACS") hereby respond to document and information request number 21a, as well as information request numbers 21b and 21c, from the Wireless Telecommunications Bureau's October 11, 2012 request for information and clarification in the above-referenced proceeding (the "October 11 Letter").

The documents contained on the enclosed CD-ROM disc respond to document request number 21a. In accordance with the October 11 Letter, the documents contained on the enclosed CD-ROM disc, which contains Summation load files, are identified as submitted by ACS, the production volume is sequentially numbered ACSFCC006-001 to follow previous volumes of documents submitted, and the individual images are sequentially numbered ACS_FCC000026654 through ACS_FCC000026733 to follow previous submissions of images. The production index associated with the enclosed documents is provided electronically on a separate CD-ROM disc.

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Letter from Ruth Milkman, Chief, Wireless Telecommunications Bureau, to Lisa Phillips, ACS Wireless, WT Docket No. 12-187 (Oct. 11, 2012). ACS's response to document request number 21d was provided under separate cover.

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Information request numbers 21a through 21c state:

- 21. On Page 3 of the Petition for Declaratory Ruling, the Applicants state that ACS plans to seek CETC designation for additional parts of the state.
- a. Provide copies of the Alaska designation documents for ACS.
- b. Explain what additional parts of the state of Alaska ACS plans to request the designation and the reasons for the decision to see the designation.
- c. Explain what, if any, benefit(s) there is to consumers if the Universal Service Fund supports in those areas two competitive ETCs sharing the same facilities.

ACS Response:

a. ACS submits herewith the orders of the Regulatory Commission of Alaska that are responsive to this request, which grant CETC designation to ACS Wireless, Inc. ("ACS Wireless") in the study areas of the following incumbent local exchange carriers ("ILECs"):

ACS of Alaska (Juneau Study Area and Greatland Study Area)

ACS of Anchorage

ACS of Fairbanks

ACS of the Northland (Glacier State Study Area)

Alaska Telephone Company

Copper Valley Telephone Cooperative

Ketchikan Public Utility

Matanuska Telephone Association

b. As stated in the Petition, ACS Wireless currently is designated as a competitive eligible telecommunications carrier ("CETC") in the service areas of the following ILECs: ACS of Anchorage, Inc., ACS-Fairbanks, Inc., ACS-Northland (Glacier State study area), ACS-Alaska (Greatland and Juneau study areas), Alaska Telephone Co., Copper Valley Telephone Coop., Ketchikan Public Utility, and Matanuska Telephone Association.

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c. As explained in the Petition and in the Applications, the public will benefit in several respects if both ACS Wireless and GCI remain eligible for high-cost universal service support post-closing, while both make use of the jointly owned AWN facilities.

First, the public will greatly benefit from access to the competitive services provided by both GCI and ACS Wireless, particularly Lifeline services in chronically low-income regions of Alaska. ACS Wireless and GCI are diversified carriers, and offer multiple service combinations or bundles that include wireless voice and broadband offerings as well as handsets and other services. Consumers will have greater choices with access to the offerings of both ACS Wireless and GCI, even if their mobile wireless platform is shared. Losing ETC status would impair ACS Wireless's ability to deploy, maintain and upgrade advanced services in many parts of the state, including offering Lifeline services, and thus would deny consumers the benefit of competition in these areas.

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Second, the joint venture will further the Commission's goals of encouraging efficient deployment of limited resources and supporting only one mobile wireless network in any given geographic area, without reducing consumer choices from retail competitors. As explained in the Applications, the combining of network facilities and spectrum resources will enhance ACS Wireless's geographic coverage and allow its customers greater handset choices in the near term. It also will permit GCI to provide more advanced broadband services more quickly than it otherwise could do. In the long term, the joint venture will permit consolidation of limited resources, and realization of network, operational and spectrum efficiencies. ACS believes that the increased scale efficiencies it anticipates from this transaction are necessary for ACS Wireless to remain competitive.

No burden will be placed on the high-cost support mechanism as a result of this transaction – high-cost support will continue to be provided only to one underlying service provider per customer. As explained in more detail elsewhere, all high-cost wireless support received by ACS Wireless and GCI will flow to AWN to support the underlying network.

Ultimately, consumers will benefit because ACS Wireless and GCI both will be better positioned to compete with AT&T Mobility, the largest mobile carrier in Alaska, and Verizon Wireless, another national giant about to enter the market. As stated in the Applications, ACS believes that this transaction is necessary for it to remain competitive in light of the financial and competitive realities the company faces.

This response to information request numbers 21a, 21b, and 21c contains information that is Highly Confidential to ACS and therefore is being provided under seal pursuant to the Commission's Second Protective Order in this docket. The highly confidential information is marked Highly Confidential for the filing of the confidential version of this letter and the highly confidential information is redacted for the filing of the public version of this letter, consistent with the requirements of the Second Protective Order. The documents provided on CD-ROM in response to document request number 21a are publicly available at the Regulatory Commission of Alaska and are not being filed electronically with the Commission.

ACS has made diligent efforts to ensure that none of the documents it is submitting here is privileged under the attorney-client privilege or attorney work product doctrine. To the extent that any privileged documents may have been inadvertently produced, such production does not constitute a waiver of any applicable privilege. ACS requests that any privileged documents inadvertently produced be returned to ACS as soon as such inadvertent production is discovered by any party, and reserves all rights to seek the return of any such documents.

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Please contact me should any questions arise concerning this filing.

Respectfully submitted,

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cc: Kathy Harris, Wireless Telecommunications Bureau